

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR LLC,)	
)	Redacted:
Plaintiff,)	Public Version
)	
v.)	C.A. No. 19-2240-CFC
)	
MONOLITHIC POWER SYSTEMS,)	
INC.,)	
)	
Defendant.)	

**DECLARATION OF ALISTAIR BURTON IN SUPPORT OF
DEFENDANT MONOLITHIC POWER SYSTEMS'S MOTION TO
DISQUALIFY FISH & RICHARDSON P.C.**

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Dated: April 30, 2020

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VOLTERRA SEMICONDUCTOR LLC,)	
)	
<i>Plaintiff,</i>)	C.A. No. 19-02240-CFC
v.)	
)	CONFIDENTIAL—FILED
MONOLITHIC POWER SYSTEMS, INC.,)	UNDER SEAL PURSUANT
)	TO LR 26.2
<i>Defendant.</i>)	
)	
)	

**DECLARATION OF ALISTAIR BURTON IN SUPPORT OF DEFENDANT
MONOLITHIC POWER SYSTEMS'S
MOTION TO DISQUALIFY FISH & RICHARDSON P.C.**

1. I, Alistair Burton, am currently employed as the Accounting Manager at Monolithic Power Systems, Inc. ("MPS"). I have been employed by MPS in this capacity since February of 2018. Previously, I was an Accounting Supervisor for MPS from March 2017 to February 2018, and a Senior Accountant with MPS from March 2014 to March 2017. In my role with MPS, among other responsibilities I am familiar with MPS's invoicing system. I provide this declaration based on my personal knowledge and on behalf of MPS.

2. I understand that MPS was previously represented by Fish & Richardson P.C. ("Fish"). As part of Fish's representation of MPS, Fish provided

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MPS invoices reflecting the work Fish conducted for MPS. MPS retained copies of these invoices, as is its standard procedure.

3. Attached as Exhibit 1 are true and correct copies of excerpts from 41 invoices received from Fish regarding its representation of MPS. These invoices begin with work in August of 2007, and end with work conducted in February of 2012.

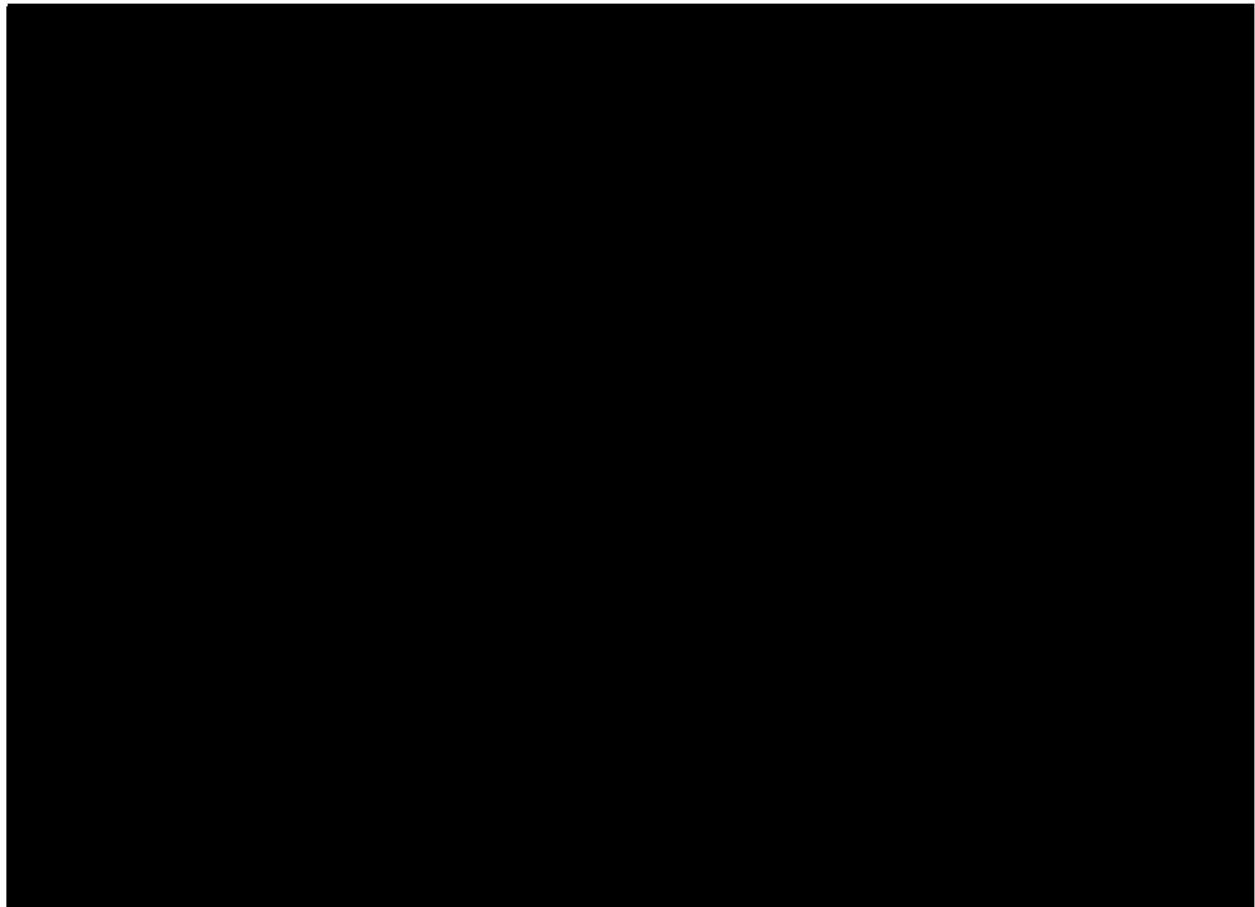
4. Each of the individual invoices also has an "invoice number." The invoice numbers begin at invoice number [REDACTED] and end at invoice number [REDACTED]

5. The total hours billed across all these invoices is on the order of [REDACTED] hours across all matters. This reflects only the hours recorded as billed on the invoices included in the exhibit. As can be seen on review of the invoices, time was recorded on occasion at "(NO CHARGE)," and each such entry was billed as "0.0" hours, which I have not accounted for. I instead only summarize the total hours from the entries Fish provided in the invoices in the exhibit.

6. Based on Fish's publicly available current employee profiles, at least [REDACTED] individuals included on these invoices are current partners/principals at Fish & Richardson, spread across three different Fish offices. They include:

[REDACTED]

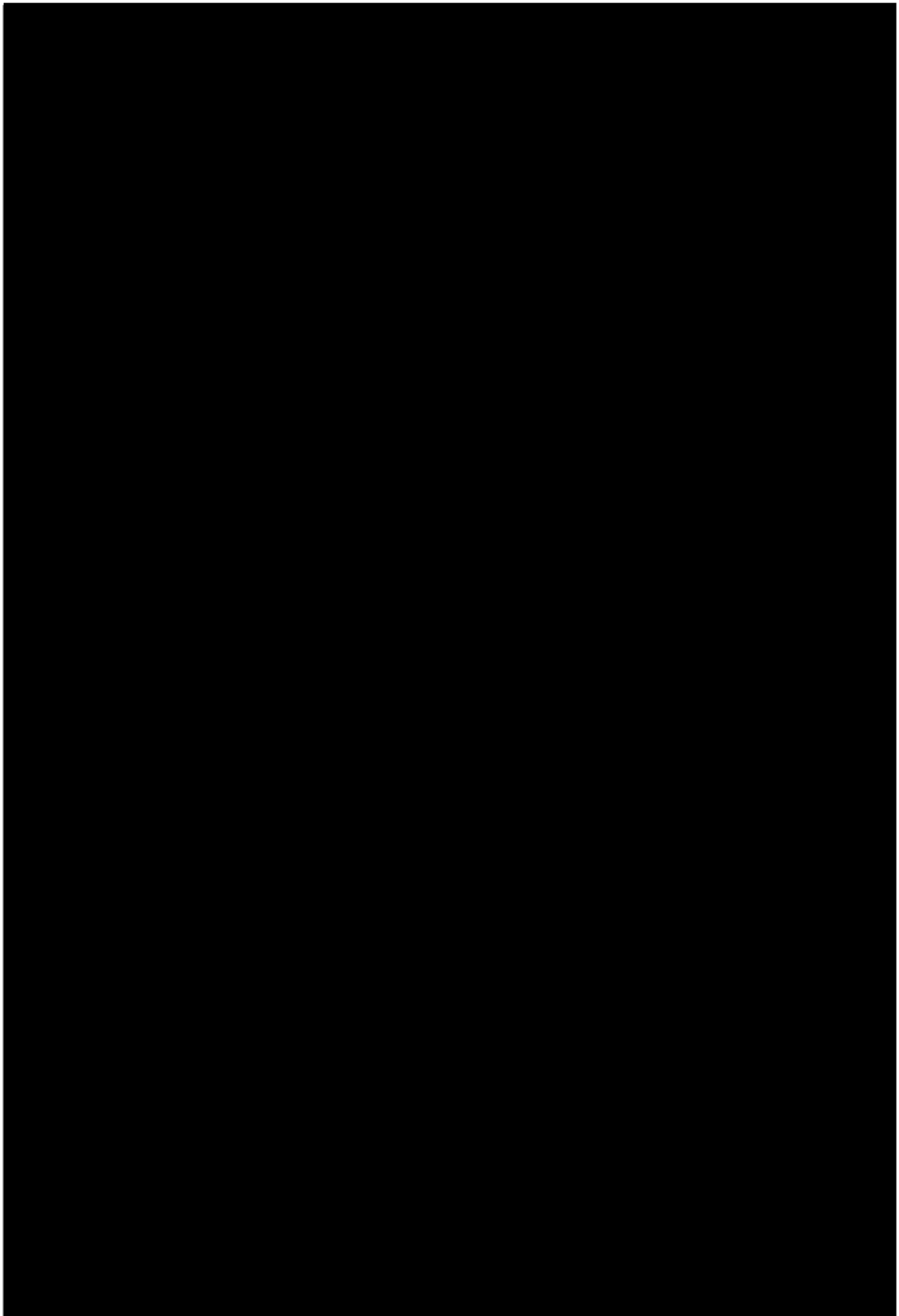
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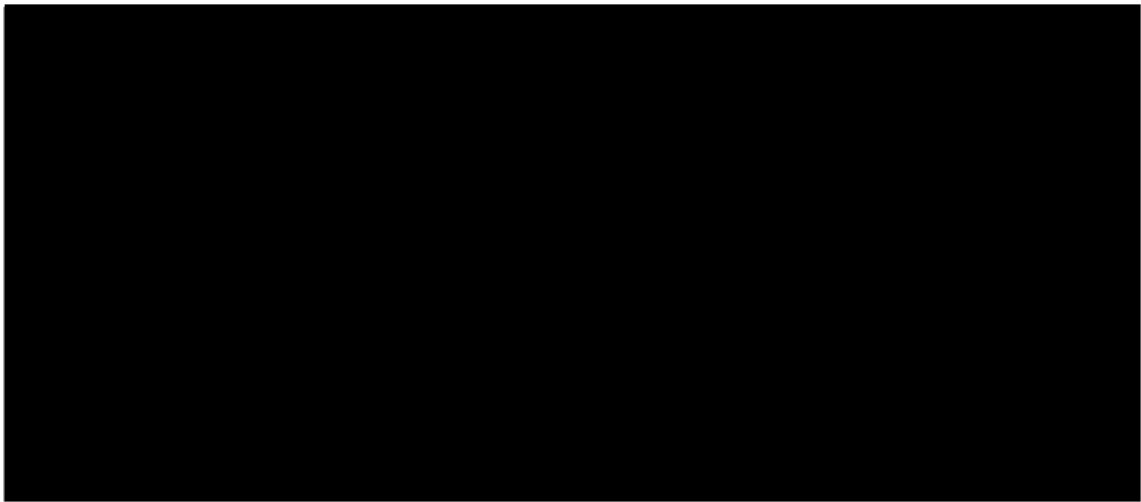
7. Fish worked on multiple different matters for MPS. Fish's invoices billed MPS for time worked on each matter separately. Each matter was assigned a number, composed of MPS's client number, [REDACTED] and a specific matter number following it. For the Powertech matters, the client number is [REDACTED]

8. Each matter was also given a textual description, though these descriptions changed occasionally over time. The summary table below identifies the client matter numbers reflected in the invoices and the accompanying descriptions. Where the same number has been used for two matter descriptions, I identify them separately.

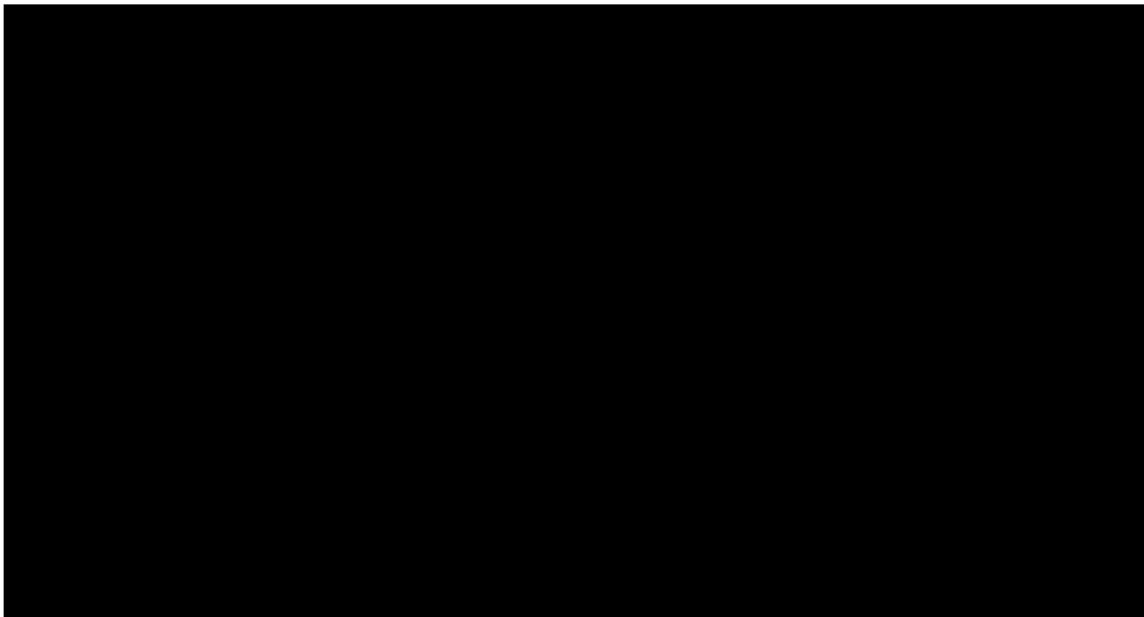
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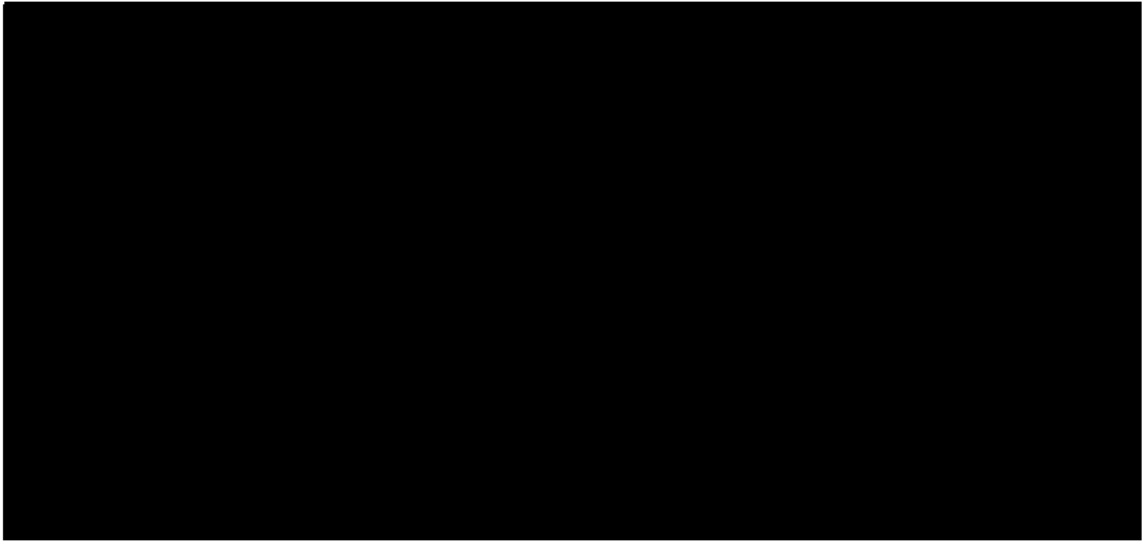
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9. The invoices themselves contain descriptions and hour totals of the work done, broken down by task and timekeeper. To assist the Court, I identify some analytics for key matters that can be derived from a review of the invoices. These analytics include the hours billed for each matter, the billers who recorded time for each matter, and the date range for each matter. The matters discussed below are as follows:



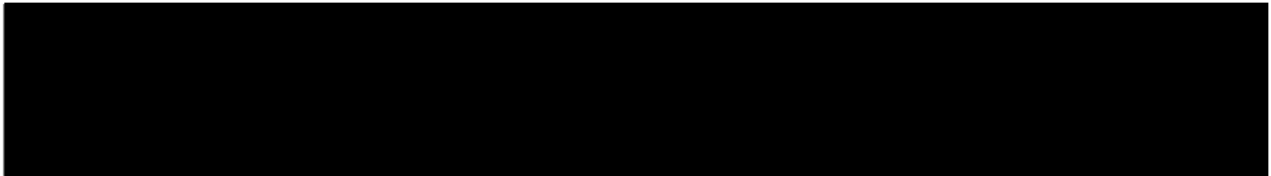
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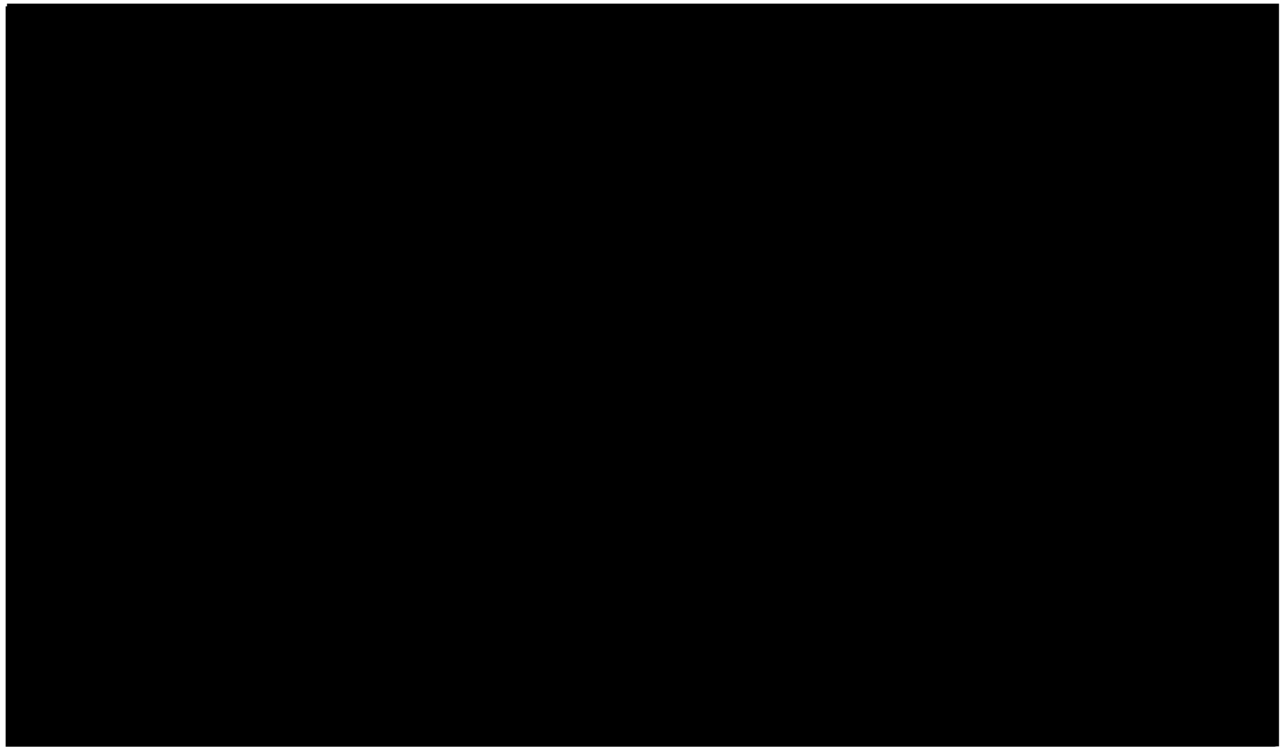
Matter 1:



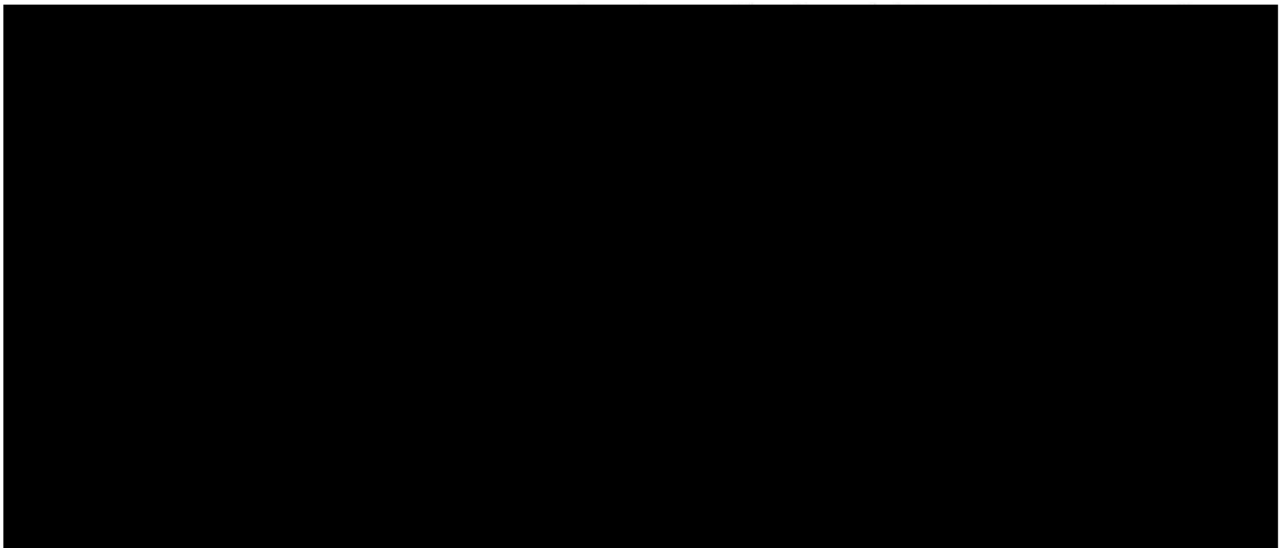
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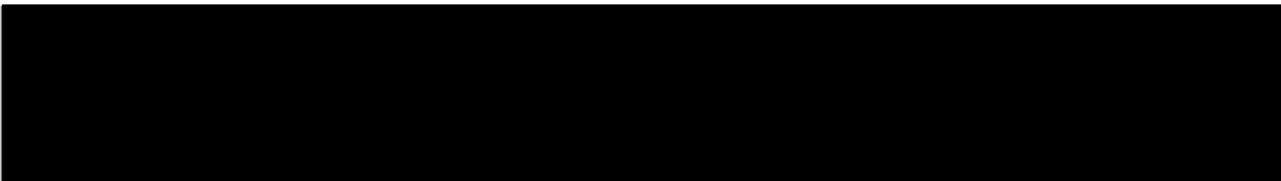
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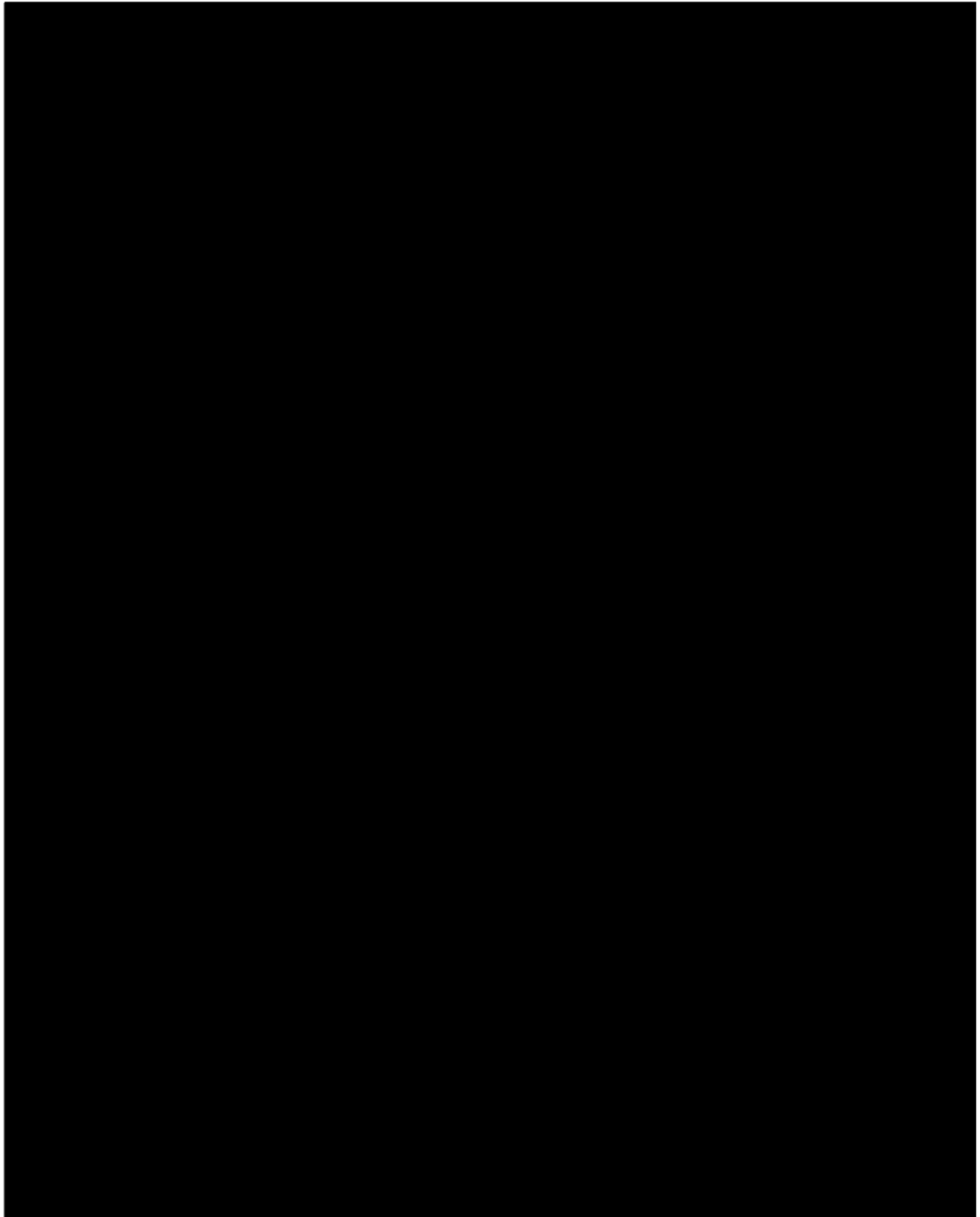
Matter 3:



Matter 4:



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[REDACTED]

Matter 5:

[REDACTED]

[REDACTED]

Matter 6:

[REDACTED]

[REDACTED]

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[REDACTED]

Matter 7:

[REDACTED]

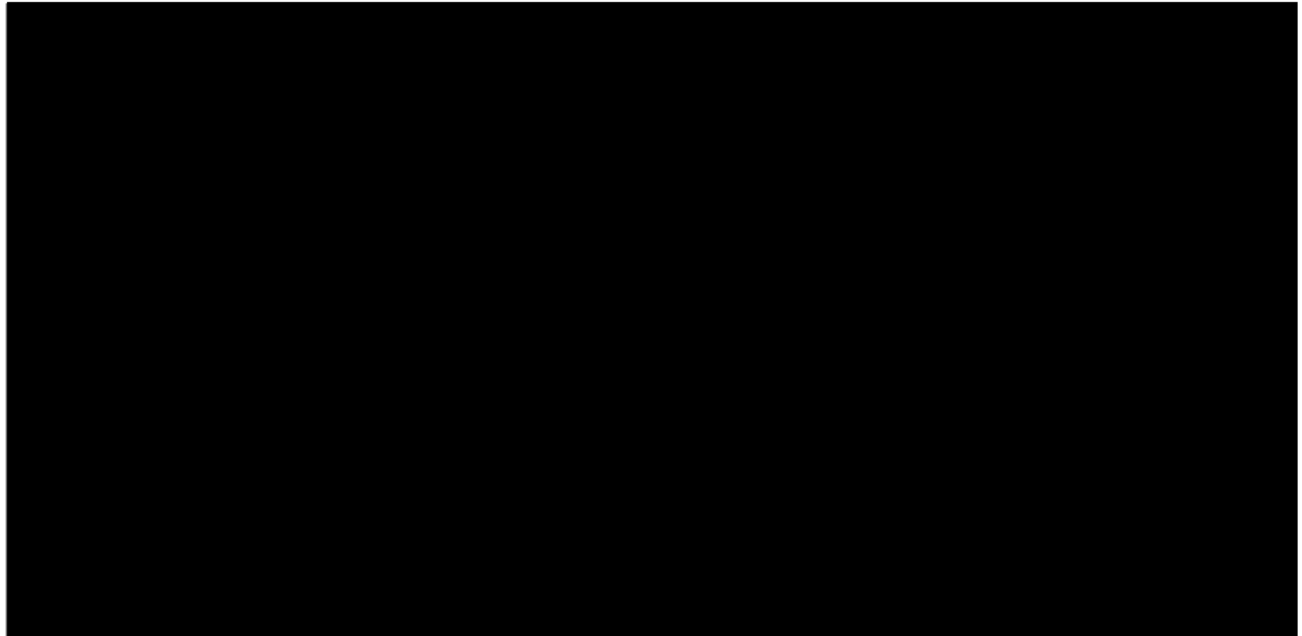
[REDACTED]

Matter 8:

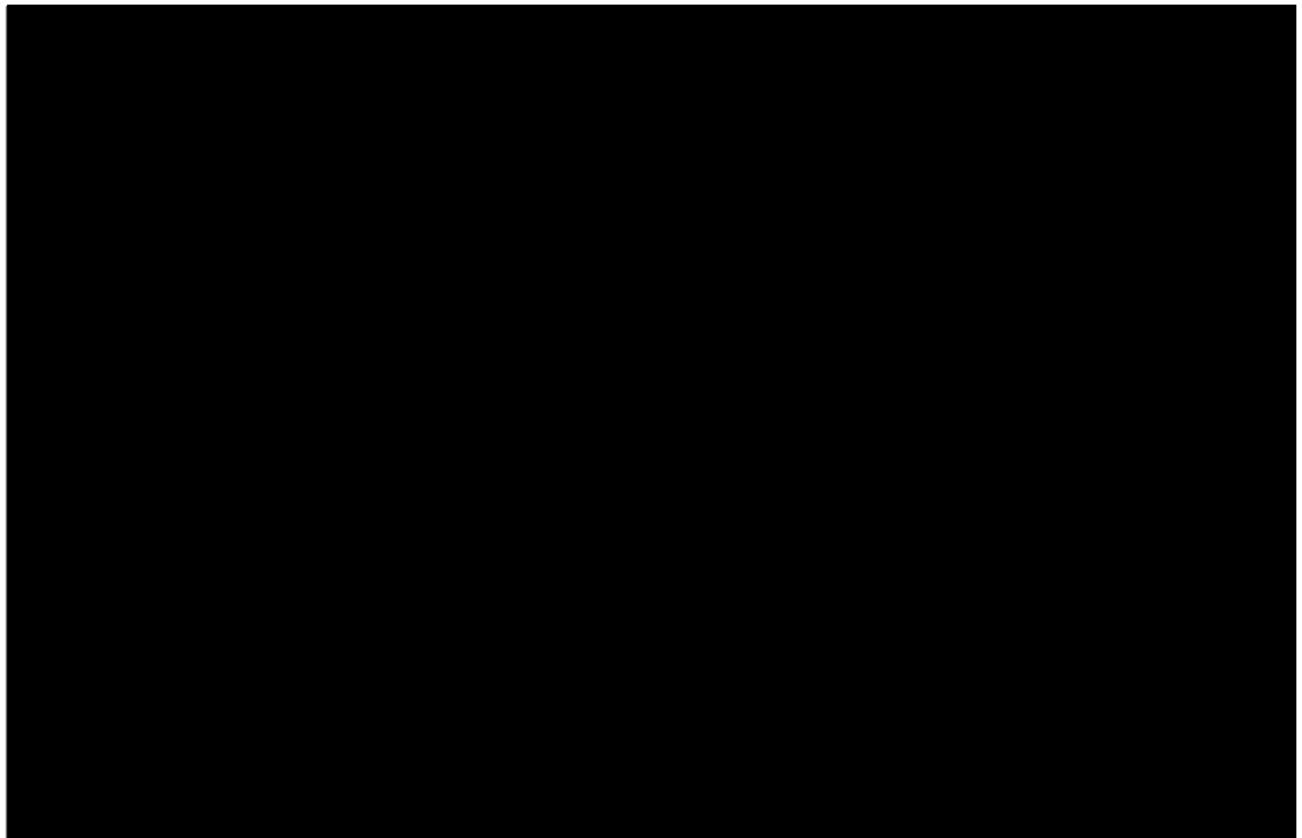
[REDACTED]

[REDACTED]

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Matter 9:



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[REDACTED]

Matter 10:

[REDACTED]

[REDACTED]

Matter 11:

[REDACTED]

[REDACTED]

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[REDACTED]

Matter 12:

[REDACTED]

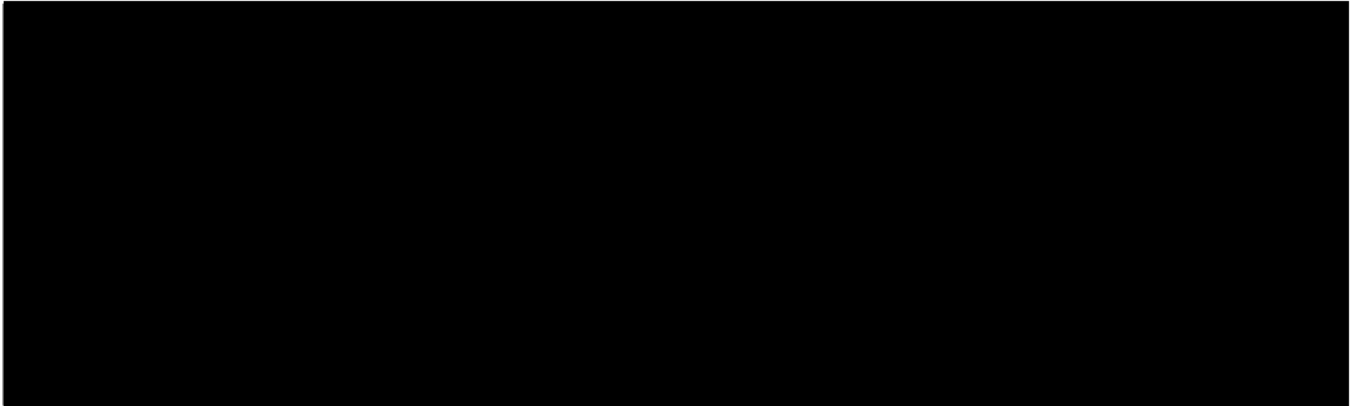
[REDACTED]

Matter 13:

[REDACTED]

[REDACTED]

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51. The foregoing is true and correct to the best of my knowledge.

Executed on April 30, 2020



Exhibit 1

Redacted In Its Entirety

CERTIFICATE OF SERVICE

I, Karen E. Keller, hereby certify that on April 30, 2020, this document was served on the persons listed below in the manner indicated:

BY EMAIL

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